

EXHIBIT J

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November 14, 2005

Via Facsimile and First Class Mail

Tory Weigand, Esq.
Morrison Mahoney LLP
250 Summer St.
Boston, MA 02110

re: Judith Thibeu
and George Thibeu
v
United States of America and
East Boston Neighborhood Health Center Corp.
U.S. District Court / Eastern District Massachusetts
Docket No. 04-10643MLW
Our File #02/43

Dear Tory:

This will confirm our telephone conversation this morning in which I advised you that I had not yet received your client's response to plaintiffs' second request for production of documents. I called in accordance with Local Rule 7(A) (2) and in anticipation of having to file a motion to compel production of documents. You advised me that you would get me what I needed in a couple of days, or no later than the end of the week (November 18).

During our conversation I notified you that in particular (but not limiting my request) I am seeking a copy of the form that was written and/or filled out by Dr. Richard Price in response to a request by Dr. Pietrantonio or Dr. Taylor and which Dr. Price referred to in his deposition and video tape trial testimony on July 18, 2005. You advised me that you thought that the U.S. Attorney's office should have a copy of that document. I noted that Assistant U.S. Attorney Alberto had written to Dr. Taylor notifying him that the requested document was not in the files of the U.S. Attorney's office or the files of HHS Counsel, Richard Bergeron; and asking Dr. Taylor to locate the document. I have enclosed a copy of attorney Alberto's letter to Dr. Taylor, which previously had been copied to your office.

If I do not receive a copy of Dr. Price's report, along with your client's response to plaintiffs' second document request, I will proceed to file a motion to compel.

Thank you for your attention to this matter.

Very truly yours,


James L. Frederick

cc: Christopher Alberto, Esq.
Assistant U.S. Attorney



U.S. Department of Justice

Michael J. Sullivan
United States Attorney
District of Massachusetts

Main Reception: (617) 748-3100

John Joseph Moakley United States Courthouse
1 Courthouse Way
Suite 9200
Boston, Massachusetts 02210
July 25, 2005

James O. Taylor, M.D.
Chief Medical Officer
East Boston Neighborhood Health Center
10 Gove Street
East Boston, MA 02128

Re: Judith Thibeau, et al. v. U.S., et al., No. 04-10643-MLW

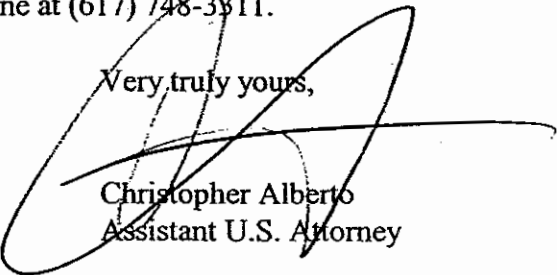
Dear Dr. Taylor:

Richard Price, a student intern, testified that he completed a report for your Clinic or HHS about a year after Judith Thibeau's accident. He stated it was very similar to the practitioner's narrative which was completed by Dr. Pietrantonio. Please see attached.

Plaintiff's counsel, James Frederick, requests that the document be produced. A search of my files, as well as HHS Counsel, Richard Bergeron's search of HHS files, indicates that no document completed by Richard Price has been provided to the United States. Attorney Bergeron, however, located an August 28, 2003 letter from you noting that Mr. Price's narrative was "still pending." Therefore, I request that you search your files to locate the alleged document which Richard Price testified he completed and mailed.

If you have any questions or comments, please do not hesitate to contact me at christopher.alberto@usdoj.gov or by telephone at (617) 748-3811.

Very truly yours,


Christopher Alberto
Assistant U.S. Attorney

CA/ejs

cc: James L. Frederick, Esq.
Charles M. Urso, Esq.